



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 15, 2014

PAULA MACKEY, TREASURER
DENTON COUNTY REPUBLICAN VICTORY
FUND
PO BOX 187
DENTON, TX 76202

Response Due Date
11/19/2014

IDENTIFICATION NUMBER: C00412569

REFERENCE: JULY QUARTERLY REPORT (04/01/2014 - 06/30/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 item(s):

1. The totals listed on Line(s) 6(c), 7, 11(a)(i), 11(a)(ii), 11(a)(iii), 11(b), 11(c), 11(d), 15, 17, 18(a), 18(c), 19, 20, 21(a)(i), 21(a)(ii), 21(c), 30(b), 30(c), 31, and 32, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))
2. On Schedule A supporting Line 15 you disclose apparent transfers from your non federal account. Be advised that transfers from your non federal account should only be disclosed on Schedule H3 supporting Line 18(a). Please amend your report to clarify this discrepancy. (11 CFR §§104.10 and 104.17)
3. The Detailed Summary Page, on Line 18(a) Column A of your July Quarterly Report (4/1/14-6/30/14), discloses \$42,028.63 in transfers from the non-federal account for allocated activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$16,343.81 as the non-federal share for allocated activity for the reporting period. While the non-federal account is

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permitted to transfer funds to the federal account for allocated activity, transfers for allocated activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. (11 CFR §§106.6(e)(2) and 106.7(f)(2)) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

4. On Schedule H4, your allocated activity or event year-to-date total calculations for the Administrative category are incorrect. Allocated activity or event year-to-date totals for administrative, voter drive, exempt activity costs and expenses for public communications made by PACs referencing only political parties are derived by aggregating all disbursements during the calendar year for each separate category. Allocated activity or event year-to-date totals for fundraising and direct candidate support activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous event year-to-date total for that category or event. This running event year-to-date total should be disclosed after each disbursement is listed. Please amend your report by providing the correct event year-to-date totals. (11 CFR §§104.10(b)(2) and 104.17(b)(1)(ii))

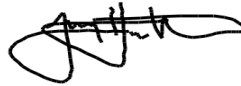
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1148.

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Sincerely,

A handwritten signature in black ink, appearing to read 'Quy Vuong', with a stylized, looping flourish at the end.

Quy Vuong
Senior Campaign Finance Analyst
Reports Analysis Division